

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: HARRY LEE RICHARDSON, III  
and CATHITA RICHARDSON

DEBTOR  
CASE NO. 17-13662-JDW  
CHAPTER 13  
CREDITOR

FIDELITY BANK

**MOTION FOR ADEQUATE PROTECTION**

COMES NOW Fidelity Bank (Fidelity), by counsel, and moves the Court to order adequate protection payments as follows:

1. Fidelity holds a secured claim covering a 2013 Kia Optima EX vehicle bearing VIN 5XXGN4A74DG104627.

2. Pursuant to 11 U. S. C. § 1326(a)(1)(C), Debtor(s) is to pay adequate protection payments to Fidelity beginning no later than thirty (30) days after the order for relief. Debtor(s) has not paid and Fidelity has not received adequate protection payments. Debtor(s) should be required to pay adequate protection payments to Fidelity.

WHEREFORE, Fidelity moves the Court to order adequate protection payments as aforesaid; and Fidelity requests such other relief to which it may be entitled in the premises.

Respectfully submitted,

FIDELITY BANK

by: /s/Olivia Spencer, Its Attorney

KING & SPENCER, PLLC  
POST OFFICE BOX 123  
JACKSON, MS 39205  
PHONE: 601-948-1547, MB #104439  
spencer@kingandspencer.net

**CERTIFICATE OF SERVICE**

I, Olivia Spencer, Attorney for Fidelity Bank do hereby certify that I have this day caused to be served, via CM/ECF and/or United States Postal Service, a true and correct copy of the above and foregoing "Motion for Adequate Protection" to:

Selene D. Maddox, Esq.  
sdmaddox63@gmail.com  
ATTORNEY FOR DEBTOR

Henry J. Applewhite  
happlewhite@applewhitelaw.com  
TRUSTEE

Henry G. Hobbs, Jr.  
USTPRegion05.JA.ECF@usdoj.gov  
U.S. TRUSTEE

SO CERTIFIED this the 16<sup>th</sup> day of October 2017.

/s/Olivia Spencer

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